

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 3:23-cr-00175
)	JUDGE TRAUGER
PATRICK CASH)	

SENTENCING MEMORANDUM ON BEHALF OF THE UNITED STATES

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorney, Joshua A. Kurtzman, and submits this sentencing memorandum in this matter on behalf of the United States. As an initial matter, the United States submits that the Guideline range is accurate given the charged conduct and the Defendant's criminal history, but the sentence envisioned in the parties' plea agreement, which contains a non-custodial, is appropriate based on the factors presented in the Defendant's sentencing position. However, the United States asserts that there are two critical conditions of probation that must be imposed, one of which is contained in the Revised Pre-Sentence Report and one, which is not, that should be imposed at the time of sentencing. First, the United States asks the Court to order the defendant to participate in cognitive behavioral therapy. Such a program could alleviate the defendant from engaging in similar criminal conduct in the future and associating with hate groups. Second, the United States asks that the Court impose a condition that the defendant not associate with the Goyim Defense League, its members, or any similar group that advocates for violence against any racial, religious, or ethnic population. Accordingly, for the reasons outlined above, the United

States joins the Defendant's Sentencing Memorandum, filed at Docket Entry 51 and asks that the Court sentence the Defendant to a three-year term of probation.

Respectfully submitted,

THOMAS J. JAWORSKI
Acting United States Attorney

By: /s/ Joshua A. Kurtzman
JOSHUA A. KURTZMAN
Assistant U.S. Attorney
716 Church Street – Suite 3300
Nashville, Tennessee 37203
Phone: (615) 401-6617
joshua.kurtzman@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing will be served electronically to counsel for defendant via CM/ECF on November 19, 2024.

/s/ Joshua A. Kurtzman
JOSHUA A. KURTZMAN